

Exhibit 2

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

MADGALENE K. SIMMS
236 Fox Squirrel Circle
Columbia, SC 29209

Plaintiff

v.

MGM NATIONAL HARBOR, LLC
3950 Las Vegas Boulevard South
Las Vegas, NV 89119

Serve to:
CSC-LAWYERS INCORPORATING SERVICE
COMPANY
7 ST. PAUL STREET
SUITE 820
BALTIMORE MD 21202

Defendant

Case No. C-16-CV-25-001001

RS

COMPLAINT

Madgalene Simms (*hereinafter*, "Plaintiff" or "Simms"), by and through undersigned counsel, brings this civil action against Defendant MGM National Harbor, LLC (*hereinafter*, "MGM"), and states as follows:

JURISDICTION AND PARTIES

1. Plaintiff Simms is an individual who is over the age of 18 whose domicile is in Columbia, South Carolina.

~~2. Defendant MGM is a limited liability company lawfully doing business in Prince~~
George's County, Maryland.

3. Jurisdiction is proper in this Court pursuant to MD. CODE ANN., Cts. & Jud. Proc. §§ 6-102 and 6-103.

4. Venue is proper in this Court pursuant to MD. CODE ANN., Cts. & Jud. Proc. §§ 6-201 (a) and 6-202 (8).

FACTS

5. On or about April 23, 2024, Plaintiff entered the MGM National Harbor location at 101 MGM National Avenue, Oxon Hill, Maryland 20745 (hereafter, "Premises") as a business invitee.

6. On information and belief, at all material times mentioned in this Complaint, all agents and/or employees of Defendant MGM were acting within the course and scope of their agency and employment with Defendant MGM.

7. At all times material to this complaint, Defendant MGM operated a hotel, casino, and entertainment complex located at 101 MGM National Avenue, Oxon Hill, MD 20745. Defendant invited the general public, including Plaintiff, to enter the Premises as a business invitee and utilize its services.

8. On or about April 23, 2024, as Plaintiff was lawfully walking through the Premises, specifically near the Blossom cocktail lounge, she suddenly and without warning slipped and fell on a hazardous condition, that was present on the floor. This fall caused Plaintiff to sustain the serious injuries and damages described below.

COUNT: NEGLIGENCE

~~9. Plaintiff re-alleges, adopts and incorporates herein by reference as a part of this Count~~
all of the averments of paragraphs 1 through 8 herein above as fully and completely as if the same were set forth verbatim herein.

10. At all material times, it was the duty of the Defendant to provide a safe environment

suitable for all invitees on its premises, including Plaintiff.

11. Defendant, as owner and operator of the Premises, negligently:

- a) Failed to maintain the floors of the Premises in a reasonably safe condition;
- b) Allowed a hazardous condition, to come into contact with and remain on the floor of the Premises when Defendant knew, or in the exercise of reasonable care should have known, that the condition created an unreasonable risk of harm to invitees on the Premises;
- c) Failed to warn Plaintiff of the danger presented by the presence of the slippery substance on the floor;
- d) Failed to warn Plaintiff of the dangerous condition on the floor; and
- e) Failed to otherwise exercise due care with respect to the matters alleged in this complaint.

12. As a direct and proximate result of the Defendant's negligence, Plaintiff slipped and fell while lawfully on the Premises as a business invitee.

13. As a direct and proximate result of Defendant's negligence, Plaintiff has sustained multiple personal injuries.

14. As a direct and proximate result of Defendant's negligence, Plaintiff has suffered lost wages and other economic hardships.

15. As a direct and proximate result of Defendant's negligence, Plaintiff has also incurred pain, suffering and other damages.

~~WHEREFORE~~, Plaintiff Madgalene Simms demands judgment against the Defendant
MGM National Harbor, LLC for compensatory damages in an amount in excess of Seventy-Five
Thousand Dollars (\$75,000.00), with interest and costs.

Respectfully Submitted,

/s/ Stacy C. Hansen

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DEMAND FOR JURY TRIAL

Plaintiff, Madgalene Simms, hereby demands a trial by jury in the above-captioned matter.

Respectfully Submitted,

/s/ Stacy C. Hansen

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